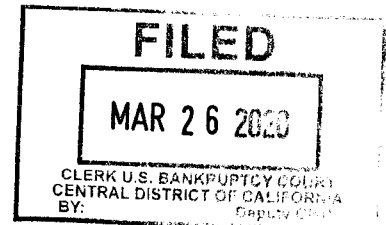


United States Bankruptcy Court

Central District of California Northern Division



In re:

HVI Cat Canyon, Inc.

EIN No.: 13-3975574

)
)
) Case No.: 9:19-bk-11573-MB
)
) Chapter 11
)
)

NOTICE OF OBJECTION TO:

Michael A. McConnell, the Chapter 11 trustee (the "Trustee") for the estate of HVI Cat Canyon, Inc. (the "Debtor"), has filed papers with the court to move for an order: (1) setting procedures for assumption of oil and gas leases; (2) authorizing the assumption of any and all unexpired surface leases; and (3) authorizing the rejection of the Lakeview office and ware house lease (the "Motion"); docket no. 812.

I Robert S. Thomson, Trustee and an individual member of the Thomson Revocable Declaration of Trust and holder of a Surface Lease (re: Exhibit "2" and "3" of the Motion), object and dispute the Pre-Petition and Post-Petition amounts identified in Exhibit "2" and "3" of the Motion. The Motion makes no mention of unpaid and possible shortened production royalty payments.

Pursuant to the terms of a Unit Agreement for the Richfield East Dome Unit, Richfield Oil and Gas Field, Orange County, California dated October 15, 1969, recorded on Dec 30, 1969, as Instrument No. 188862, in Book 9177, at page 873 of the Official Records of Orange County, California ("Unit Agreement"), The Thomson Revocable Declaration of Trust is currently entitled to certain royalty interests each month from the debtor.

The Debtor has failed to make REDU royalty production payments since November 2018. The actual cure amount for unpaid royalties is undetermined as the Debtor possess and not released the production reports. Additionally, all past received royalty payment amounts are questionable in that the payment calculations provided are inadequate and seemingly do not correlate to the REDU agreement. Again, the Debtor possess this accounting information and despite numerous written and verbal requests (as far back as 2005) for production payment calculations we have yet to receive this information.

We request unpaid Royalty Production Payments and auditing of past Royalty Production Payments for possible shortfalls be added to the cure amount for Pre-Petition and Post-Petition claims.

Date: 03.23.2020

A handwritten signature in black ink, appearing to read "Robert S. Thomson".

Robert S. Thomson
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San Diego, CA 92109

CC:
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